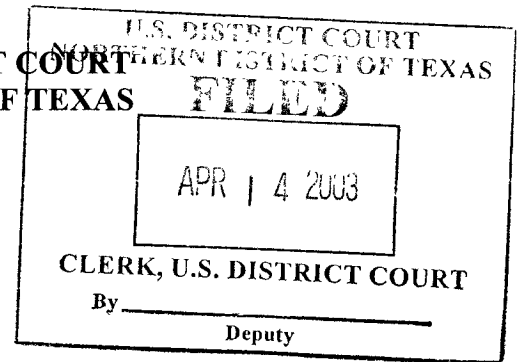


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**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**



**JEFFREY A. KRALLER and
ALAN POLLENZ,**

Plaintiffs,

v.

**ALLIED PILOTS ASSOCIATION, a
Labor Organization,**

Defendant.

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Civil Action No.

3 0 3 C V - 7 6 1 P

**PLAINTIFFS' MOTION FOR
TEMPORARY RESTRAINING ORDER AND
PRELIMINARY INJUNCTION**

Plaintiffs hereby respectfully move this Honorable Court, pursuant to F. R. Civ. P. rule 65, for a temporary restraining order and preliminary injunction maintaining the *status quo ante*, by temporarily restraining and preliminarily enjoining the defendant from enforcing threatened disciplinary action against the plaintiffs, to be effective April 15, 2003, such threatened discipline being the revocation of all rights of access, as members in good standing, to all members-only areas of the defendant's official web site.

Revocation of such access will irreparably injure plaintiffs' right to be free of union discipline imposed in violation of their procedural due process rights under 29 U.S.C. § 411(a)(5), and will further irreparably injure their free speech and association rights under 29 U.S.C. § 411(a)(2) to communicate and associate electronically with fellow members and with their officers, in the usual official membership fora for such communications and associations, and to maintain a recall campaign that they are presently leading against Association president John Darrah.

This motion is supported by the accompanying brief, the verified complaint and attached exhibits, and proposed temporary restraining order.


**PLAINTIFFS' MOTION FOR TEMPORARY RESTRAINING ORDER AND
PRELIMINARY INJUNCTION, page 1**

Respectfully submitted,

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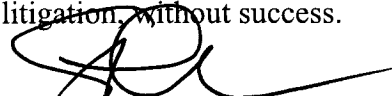
Attorneys for Plaintiff,
by:



STEPHEN GARDNER

Certificate of Conference

Plaintiffs and their counsel have engaged in sustained discussion with the defendant and its counsel, to resolve this dispute without litigation, without success.



STEPHEN GARDNER